

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

John E. Wade,)	Case No. 19-24159 CMB
Debtor)	Chapter 13
)	Related to Docket No. 52 -53
)	
New Residential Mortgage Loan Trust)	Hearing Date and Time:
Movant)	November 10, 2020 at 10:00 AM
)	
)	
vs.)	
)	
John E. Wade,)	
Respondent)	

RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes the Debtor, John E. Wade, by and through his attorney
Lauren M. Lamb, and Steidl and Steinberg, and respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. However, Debtor has been out of work due to medical reasons.
He recently started receiving long term disability benefits, as his doctor
has not cleared him to return to work. Debtor made a payment of \$665
since the filing of Movant's Motion for Relief. Attached and labeled
"Exhibit A" is a copy of the Chapter 13 Trustee's payment schedules.
7. Admitted. However, a payment of \$665 has been credited to Debtor's
account since the filing of the Motion for Relief. Debtor plans on sending

additional payments to the Chapter 13 Trustee on his own moving forward until he returns to work full time.

8. Admitted. However, Debtor plans on sending additional payments to the Chapter 13 Trustee to bring the account current.
9. Admitted.
10. Admitted.
11. Admitted.
12. Denied. Debtor plans on sending additional payments to the Chapter 13 Trustee on his own moving forward until he returns to work full time to bring his account current.
13. This is a statement to which no response is required.

WHEREFORE, the Debtor, John E. Wade, respectfully requests this Honorable Court to deny the Motion for Relief from the Automatic Stay.

Respectfully submitted,

October 29, 2020
DATE

/s/ Lauren M. Lamb
Lauren M. Lamb, Esquire
Attorney for the Debtor

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